

16 March 1977

MEMORANDUM FOR: Chief, Physical Security Division

FROM : [REDACTED]
Chief, Domestic Security Branch

STATINTL

SUBJECT : Comments Regarding Proposed Security
Regulations for the IC Staff

1. In spite of the so-called mandate by Congress to remove visible dependence of the IC Staff on the CIA, I think it is totally premature and meaningless at this time to plagiarize the [REDACTED] security regulations as proposed in the attached paper.

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2. There are many serious questions that should be of concern to the Office of Security and all DDA components that should be challenged now, rather than sit back and try to recoup our dignity at a later date.

3. First off, are all Agency regulations going to be rewritten in this manner? Is this a prototype or is Security the easiest to attack? What does this exercise really accomplish for the Agency, the IC Staff, and for the Office of Security?

4. In paragraph 1 of the cover memo [REDACTED] an assumption is put forth that "the IC Staff will place primary reliance on the Office of Security for support in this area." What of a conflict in the interpretation of Security policy? Will OS have the final say? If not, we are in serious trouble. If so, why bother to rewrite and paraphrase a set of guidelines only to remove the words CIA and Office of Security, etc? It only creates unnecessary confusion for all concerned.

5. At a glance, it is easy to rationalize this exercise as nothing more than a cosmetic approach to provide the IC Staff with an autonomous profile by simply paraphrasing the existing security regulations and substituting D/DCI/IC and ICCSFSCC where appropriate. However, the following analysis of paragraph 1, Compliance with Security Regulations, is but a minuscule example of the confusion and chaos that such a document will immediately create for the Agency and the Office of Security:

a. Page 1, 1.A.(2)

"Director of Security" is omitted. Yet "contractor personnel" is retained. Is there or will there ever be contract personnel assigned to the IC Staff? Who would approve the contractor personnel?

b. 1.C(1)(a)(b)(e)(o)

I can envision many problems regarding the Director of Security as the (ICCSFSCC) notifying or reporting to the D/DCI/IC, particularly under (b) which makes the D/DCI/IC the Director of Personnel regarding security violations in all third and fourth violations within a two-year period. The Director of Security has two masters, Admiral Turner and

STATINTL [redacted] What about violations that apply to secretaries and other clerical and support types assigned to the IC Staff? Are they considered staff CIA employees? Or will [redacted] hold their career in his hands?

c. 1.C.(2)(a)(4)

STATINTL I would think that requests for personnel action would be directed to D/OP/CIA in order to effect suspension or dismissal, rather than the D/DCI/IC! Again, are we talking about CIA staffers or military/civilian detailees assigned to the IC Staff??? Very confusing!!!

d. 1.C(3) Page 2 (D/DCI/IC)

The D/DCI/IC is now the Director of Personnel "responsible for taking action to effect the suspension or separation of employees for security violations when such action is requested by responsible authorities (responsible authorities is defined as the D/DCI/IC and other officials reporting directly to the D/DCI/IC). The ICCFSCC, of course, will be furnished with a copy of each such personnel action!!! Will the D/DCI/IC have the authority to suspend or separate an IC detailee, e.g., a Navy Commander? Or a Staff CIA secretary? (See "employees" underlined above.)

e. 1.E.(1)(a)(1)(2)(3)(4) - Penalties for Non-Compliance

Who is the authority for administrative action? The D/DCI/IC, in so far as this paper reads. Again serious problems with third and fourth violations. Additionally, what about violations regarding material that may be generated by another Agency in the Intelligence Community, e.g., a staff CIA secretary working in the IC Building fails to secure a classified document originated by DIA. Who has the authority? What regulations apply?

6. In summary, a close look at the first two pages of this rewrite borders on the absurd. Additionally, having scanned the entire rewrite, this absurdity pervades the entire paper, e.g., page 24, D - Other Activities, - "Employees should not make any indiscriminate or gratuitous admission of ICS affiliation." Why?

Also, Page 24D - Credit - Personnel Officer!!! Who is kidding whom?

Page 40 B. Minimum Storage Requirements (3) Material of any classification in Non ICS Buildings. The ICS Security Officer has the approval authority for ICS material stored in the CIA Headquarters Building???

Page 61. C.(1) - Consistent with security and cover consideration, etc. --- What cover?

7. It is recommended that the coordination regarding this package not be taken lightly by OS. Rather it should be reviewed paragraph by paragraph if the [] regulations are to be preserved. I would also question the legality of excerpting the entire [] by the IC Staff or any other agency in the Intelligence Community. It would appear that a more meaningful and professional product could be developed by the IC Staff by taking the time to draft their very own security regulations to coincide with that time when "the CIA" and the DCI's special authorities will be extended to the ICS as an independent Agency." Until such time as this becomes reality, the attached proposal does not demonstrate the ICS' independence of any one Intelligence Community agency, nor in any way remove visible dependence of the IC Staff in the CIA. You can color it any shade you wish, but the facts remain as they are until ICS independence becomes a reality.



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